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15 BRINK'S INCORPORATED

16
17 IN THE UNITED STATES DISTRICT COURT
18
19 FOR THE NORTHERN DISTRICT OF CALIFORNIA
20
21 OAKLAND DIVISION

22 ERNIE RICARDO FERNANDEZ,
23 individually, on behalf of all others similarly
24 situated, and on behalf of the general public,

25 Plaintiff,

26 Versus

27 BRINK'S INCORPORATED, a Delaware
Corporation, and DOES 1-5,

Defendants.

Case No. 15-cv-02667-JSW

Stipulation and Request to Continue
Deadline to Submit Joint Status
Report

[Proposed] Order

Hon. Jeffrey S. White, Presiding

**STIPULATION AND REQUEST TO CONTINUE DEADLINE
TO SUBMIT JOINT STATUS REPORT**

IT IS HEREBY STIPULATED AND REQUESTED by and between Plaintiff Ernie Ricardo Fernandez, by his attorneys of record (hereinafter Plaintiffs), and Defendant Brink's Incorporated, by its attorneys of record (hereinafter Defendant), that the following Stipulation and Request may be entered as an Order by the Court to give effect to the stipulations that follow:

WHEREAS, on August 25, 2015, the Court ordered this matter stayed, and ordered the parties within 10 days of entry of an order on a motion for final approval in *Belew v. Brink's Incorporated* (S.D.Cal. Case No. 14CV1748 JAH JLB)(hereinafter *Belew Settlement*) to file a joint status report setting forth their positions on how this litigation should proceed; (dkt. no. 27)

WHEREAS, on October 29, 2015, the Court in the *Belew* Settlement issued an order granting final approval of the class action settlement;

WHEREAS, on November 5, 2015, Plaintiff and Defendant filed a stipulation and request that the Court continue the deadline for the parties to file a joint status report from November 9, 2015 to November 23, 2015, in order to allow the parties time to meet and confer regarding the path forward in this matter; and

WHEREAS, Plaintiff and Defendant, having met and conferred, have agreed to request a further continuance of the deadline for the parties to file a joint status report to allow the parties sufficient time to explore settlement discussions through mediation;

THEREFORE, Plaintiff and Defendant request that the deadline for the parties to file a joint status report be continued a further 90 days, from November 23, 2015, to February 22, 2016.

1 IT IS SO STIPULATED.

2
3 November 17, 2015 LIBERATION LAW GROUP, P.C.
4

5 By: /s/ Brent A. Robinson

6 BRENT A. ROBINSON

7 COUNSEL FOR PLAINTIFF

8
9 November 17, 2015 OGLETREE, DEAKINS, NASH, SMOAK. & STEWART, P.C.
10

11 By: /s/ Becki D. Graham

12 BECKI D. GRAHAM

13 COUNSEL FOR DEFENDANT

14 FILER'S ATTESTATION

15 Pursuant to Civil Local Rules, rule 5-1(i)(3), I attest under penalty of perjury that
16 concurrence in the filing of the document has been obtained from its signatory.

17 Dated: November 17, 2015 By: /s/ Brent A. Robinson
18

19 CERTIFICATE OF SERVICE

20 I hereby certify that this document(s) filed through the ECF system will be sent
21 electronically to the registered participants as identified on the Notice of Electronic Filing
22 (NEF) and paper copies will be sent to those indicated as non-registered participants on
23 November 17, 2015.

24
25 Dated: November 17, 2015 By: /s/ Brent A. Robinson
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27

1 ORDER

2 IT IS HEREBY ORDERED that the deadline for the parties to submit a joint status
3 report is continued from November 23, 2015 to February 22, 2015.

4 IT IS SO ORDERED.

5
6 Dated: November 24 , 2015



7 HON. JEFFREY S. WHITE

8 UNITED STATES DISTRICT JUDGE